

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

DOUGLAS F. CARLSON
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL W. MILLER
(DFC/USPS-T22-1-2)

November 9, 2001

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories to United States Postal Service witness Michael W. Miller.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. In the alternative, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories DFC/USPS-1–13 are incorporated herein by reference.

Respectfully submitted,



Dated: November 9, 2001

DOUGLAS F. CARLSON

DFC/USPS-T22-1. Please refer to your revised testimony at pages 18–19 and your response to MMA/USPS-T22-15.

- a. Please identify the two facilities that replied to your survey and indicated that they did not have an 020B operation.
- b. Please specify the number of facilities that replied to your survey and indicated that their 020B operation removes the rubber bands from bundles of properly dated, faced, machinable metered letters and places these letters in trays for processing on an MLOCR. For any of the 96 facilities that have an 020B operation but that do not process metered bundles in the manner described in this interrogatory, please describe how these facilities process the metered bundles described in this interrogatory.
- c. Please confirm that proper procedure for processing metered bundles in the 020B operation is to remove the rubber bands from bundles of properly dated, faced, machinable metered letters and to place these letters in trays for processing on an MLOCR. If you do not confirm, please explain the proper procedure.
- d. Please identify the proper procedure for handling bundles of machinable metered letters that have an incorrect meter date. Specifically, should these letters be postmarked and cancelled with a proper date by an AFCS or similar machine?

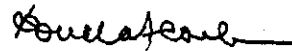
DFC/USPS-T22-2. Please refer to your revised testimony at pages 18–19 and your response to MMA/USPS-T22-15.

- a. Please confirm that the Denver P&DC removes the rubber bands from bundles of properly dated, faced, machinable metered letters that are separated by the culling system and enters these letters loose into the culling system for facing and cancelling. If you do not confirm, please clarify your handwritten note reflected on page 2 of Attachment 2 to Response to MMA/USPS-T22-15(A).

- b. Please confirm that the Denver P&DC's practice described in part (a) of this interrogatory may cause some metered letters to be rejected from the culling system because the letters are too thick, and yet some of these letters are not so thick that they could not have been processed on an MLOCR if the letters in those bundles had instead been placed in trays and taken to an MLOCR. If you do not confirm, please explain.
- c. Were stations, branches, associate offices, and city collectors that the Denver P&DC serves instructed to separate metered bundles from loose letters and place the bundles in trays?
- d. Please confirm that the Denver P&DC's handling of metered bundles is inconsistent with proper Postal Service procedures for handling metered bundles. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

November 9, 2001
Santa Cruz, California